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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**ECF CASE**

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BRIDGE OIL LTD. and  
A/S DAN-BUNKERING LTD.,

08 Civ. 7160 (LAP)(GWG)

Plaintiffs,

-against-

**AFFIDAVIT UNDER  
SUPPLEMENT RULE B**

ALANI SHIPPING CO. (UK) LTD., ALANI  
SHIPPING CO. LTD., and F. G. HAWKES  
(WESTERN) LTD.,

Defendants.

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STATE OF NEW YORK     )  
                                      :  
COUNTY OF NEW YORK    )     ss:

JOHN R. KEOUGH, III, being duly sworn, deposes and says:

1.     I am a member of the Bar of this Court and am an officer of Waesche, Sheinbaum & O'Regan, P.C., attorneys for the Plaintiffs herein. I am familiar with the circumstances of the complaint and submit this affidavit in support of Plaintiffs' request for the issuance of process of maritime attachment and garnishment against the property of the Defendants, Alani Shipping Co. (UK) Ltd., Alani Shipping Co. Ltd., and F. G. Hawkes (Western) Ltd., alien business entities, pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure.

2. I also submit this affidavit in support of the Plaintiffs' request for the issuance of an order appointing special process servers pursuant to F.R.Civ.P. 4(c) and Supplemental Rule B(1)(d)(ii).

3. Defendant Alani Shipping Co. (UK) Ltd. is party to a maritime supply contract for marine fuel and gas oil ("bunkers") on which this claim is based, and is an alien business entity organized and existing under the laws of a foreign country (United Kingdom), with its office and place of business abroad (United Kingdom).

4. Defendant Alani Shipping Co. Ltd. is party to a maritime supply contract for bunkers on which this claim is based, and is an alien business entity organized and existing under the laws of a foreign country (Cyprus), with its office and place of business abroad (Cyprus).

5. Defendant F. G. Hawkes (Western) Ltd. is party to a maritime supply contract for bunkers on which this claim is based, and is an alien business entity organized and existing under the laws of a foreign country (United Kingdom), with its office and place of business abroad (United Kingdom).

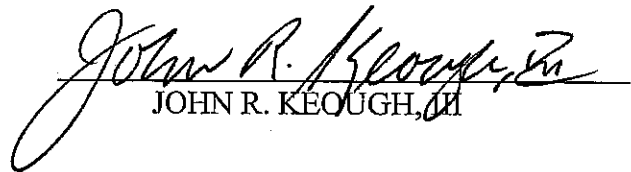
6. At my direction, my office did a search of the New York Secretary of State, Division of Corporations; the Transportation Tickler; telephone assistance; and a general Internet search using several search engines.

7. From this search, my office did not find any listing or reference to these Defendants in this District or within the State of New York. In particular, examination of the Internet does not disclose any New York presence. In the circumstances, I believe that these Defendants cannot be found within this District.

8. Upon information and belief, these Defendants have, or will have during the pendency of this action, tangible and/or intangible property within this District in the hands of ABN Amro, Atlantic Bank of New York, American Express Bank, Bank of America, BNP Paribas, Calyon, Citibank, Deutsche Bank, HSBC USA Bank NA, JPMorgan Chase Bank, Standard Chartered Bank, The Bank of New York, Wachovia Bank, and/or other local banks.

9. In light of the number of potential garnishees in this matter, and to ease the burden on the U.S. Marshal's office, I also respectfully request that partners, associates, or agents of my office be designated as special process servers under the Rules for the purpose of serving any process of maritime attachment and garnishment in the action. Such a procedure is in keeping with the admiralty practice in this District.

10. This application is the Plaintiffs' first request for such relief made to any court.

  
JOHN R. KEOUGH, JR.

Sworn to before me this  
11<sup>th</sup> day of August, 2008

  
Notary Public

SHARON J. POYNTZ  
NOTARY PUBLIC, State of New York  
No. 43-4820992 Qualified in Richmond County  
Certificate Filed in New York County  
Commission Expires February 28, 2011